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May 27, 2005

**Ex Parte**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: WT Docket No. 02-353, Service Rules for Advanced Wireless Service in the  
1.7 and 2.1 GHz Bands

Dear Ms. Dortch:

On May 26, 2005, Donald Brittingham and Charla Rath met with Peter Corea, Gary Michaels, Uzoma Onyeije, Blaise Scinto, John Spencer and Jennifer Tomchin of the Wireless Telecommunications Bureau to clarify Verizon Wireless' position on possible revisions of the Advanced Wireless Services (AWS) band plan.

At the meeting, Verizon Wireless proposed the attached band plan and discussed the major differences between it and the plan that the Commission adopted in October 2003. Verizon Wireless noted that the plan increases the number of blocks to six, shifts the location of the MSA/RSA license and does not include a 30 MHz license. Otherwise it incorporates a variety of geographic and frequency blocks, allowing for efficient aggregation of spectrum.

Specifically, Verizon Wireless noted that its plan incorporates an increase in the size of the MSA/RSA license to 20 MHz, as advocated by several parties.<sup>1</sup> We believe, however, that placement of the MSA/RSA license in the middle of the band plan would make it difficult for carriers to aggregate spectrum efficiently. Verizon Wireless urged

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<sup>1</sup> See, e.g., ex-parte communication of T-Mobile and the Rural Telecommunications Group, Inc., *In the Matter of Service Rules for Advanced Wireless Service in the 1.7 and 2.1 GHz Bands ("AWS Service Rules")* 18 FCC Rcd 25612 (2003) (filed March 11, 2005); see also ex-parte communication of CTIA – the Wireless Association, *AWS Service Rules* (filed August 6, 2004); ex-parte communication of United States Cellular Corporation, *AWS Service Rules* (filed April 29, 2005); ex-parte communication of Cingular Wireless, *AWS Service Rules* (filed May 11, 2005); and ex-parte communication of SunCom Wireless Operating Company, L.L.C., *AWS Service Rules* (filed May 20, 2005)

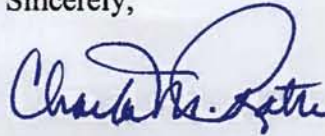


the Commission to place contiguously the EAs and REAGs, or spectrum "building blocks," permitting both efficient geographic and frequency aggregation.<sup>2</sup> Because of concerns expressed by some of the rural carriers about the remaining uncertainties surrounding the relocation of MDS licenses from the 2150-2155 MHz portion of the band plan,<sup>3</sup> Verizon Wireless proposed that the MSA/RSA license be placed in the A block.

In its initial comments in this docket, Verizon Wireless supported the adoption of a 30 MHz license. Indeed, the Commission included a 30 MHz license in its band plan because larger spectrum blocks enable "a broader range of broadband services, including Internet access at faster speeds" and "provide operators with additional capacity, and, importantly, with greater flexibility."<sup>4</sup> Verizon Wireless still believes that it is important for the Commission to adopt a band plan that permits carriers to acquire enough contiguous spectrum to provide the capacity for more advanced services. The Commission can meet this goal if it increases the number of spectrum blocks to six, but also organizes the blocks to permit multiple ways to aggregate 30 MHz of spectrum. Verizon Wireless noted that the attached band plan provides many opportunities to acquire 30 MHz of spectrum, both by combining EAs and REAGs or REAGs and REAGs.

Pursuant to section 1.1206(b)(2) of the Commission's rules, an electronic copy of the letter is being filed for inclusion in the above-referenced docket. Please direct any questions regarding this filing to the undersigned.

Sincerely,



Charla M. Rath

Attachment

cc: Peter Corea  
Gary Michaels  
Uzoma Onyeije  
Blaise Scinto  
John Spencer  
Jennifer Tomchin

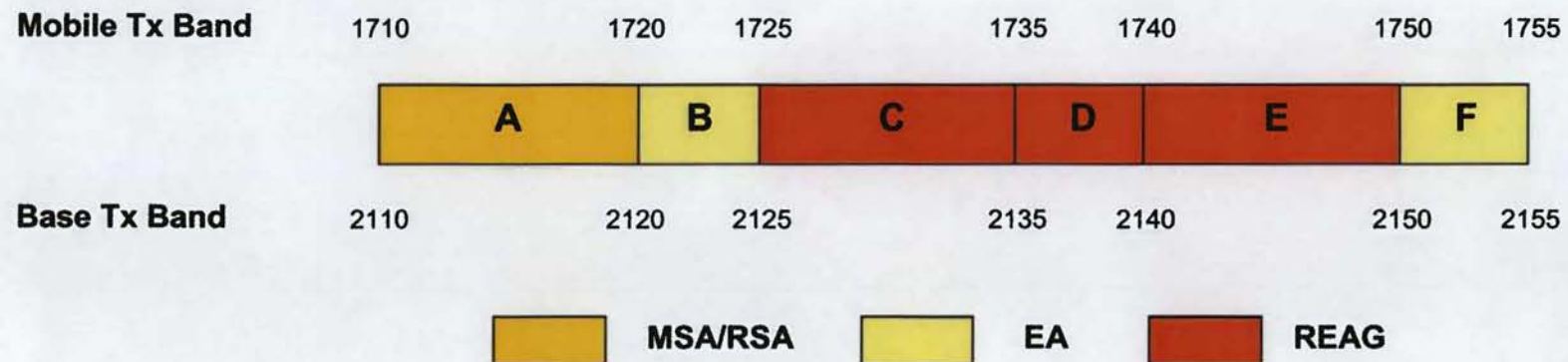
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<sup>2</sup> See *AWS Service Rules* at ¶37 ("As a result of being related to each other, EAs and REAGs can be combined to form specific service territories . . . MSAs and RSAs, however, cannot be combined to form EAs because several MSAs/RSAs cross EA borders.")

<sup>3</sup> See ex-parte communication of the Rural Cellular Association, *AWS Service Rules* (filed Feb. 17, 2005).

<sup>4</sup> *AWS Service Rules* at ¶44.

## Proposed Band Plan for Advanced Wireless Services (AWS) in the 1710-1755 / 2110-2155 MHz band



- Facilitates more efficient aggregation of spectrum blocks
- Provides more flexibility for prospective licensees
- Supports acquisition of 30 MHz blocks without requiring 30 MHz licenses
- Accommodates rural carriers' desire for 20 MHz MSA/RSA licenses